

UNITED STATES DISTRICT COURT : EASTERN DISTRICT OF VIRGINIA

JANE DOE

Plaintiff,

v.

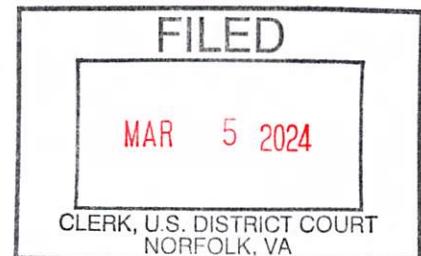
NORFOLK STATE UNIVERSITY,

BOARD OF VISITORS OF NORFOLK STATE UNIVERSITY,

Case No.:# 2-23cv470

2/21/2024

3/5/2024



Defendant.

Motion to Submit Evidence from Expert

March 5th 2024

This Motion being made ~~February 21, 2024~~ is in support to provide the courts evidence of ongoing damages. I have since the letter date not had proper counseling treatments due to lack of resources and ongoing traumas. These limitations furthering ongoing damages in my healing process from being trafficked across state lines for sex. Whereas I am a strong advocate for anti trafficking , and survivors journeys being a proven survivor in court. The Expert Witness at Pamela Hopkins LCSW in Virginia Beach has written the following which was submitted into the court for criminal trial in Currituck NC. Please see documents which explain further damages in detail of the Michael L. Williams Norfolk State employee. I ask Norfolk State University, The Commonwealth as well as Counsel to take into consideration the past state of this State institution, the current status of an active state university hosting underage minors and while having no minors on campus policy enacted to protect these minors or monitor the transporting of minors on campus for any reason in the future. Oversight of employees, Such as the guise Michael Williams purported in educational purposes for Jane Doe to accompany him and promises her a degree from the institution and using her child labor to complete his job as well as others around him. The University which others around them have a minors on campus policy are in a position to protect future visitors. As JAne Doe was treated as a business invitee to a University by a state employee. Norfolk State todays recipient for the Elizabeth River Project River star Business award, further proves the plaintiffs point of both employee vicarious liability, damages due to Jane Doe underage minor treated as a business invitee required compensation covered by due process and rights deprived under color of law as well as Doe business invitee grossly neglected as a minor for a near or around 10 year duration at Norfolk

State University. Letter from LCSW page 2 & 3

 **Healing Fountain**
heart focused holistic therapy
Pamela Hopkins, L.C.S.W
762 Independence Blvd. Suite 100C
Virginia Beach, VA 23455
Phone: (757) 486-1807 Email: pamela@healingfountain.net

November 11, 2015

To whom this letter may concern,

Hello my name is Pamela Hopkins L.C.S.W. [REDACTED] is a current client of mine in my private practice at the Healing Fountain. [REDACTED] comes in with symptoms of depression and PTSD from her childhood where she was sexually abused for years by Michael L. Williams.

[REDACTED] has shared her story of being sent to live at age 6 with Michael (her older brother's birth father), because her mother was unable to financially take care of her and she wanted her children to stay together. [REDACTED] birth father was incarcerated.

[REDACTED] remembers different experiences of her sexual abuse, although there are areas related to time and exactly how things happened where she has blocked out some memories and gets foggy. Especially within her younger grade school years. [REDACTED] has learned to cope with her severe emotional trauma from a young age by fogging out or blocking out memories that were too depressing and overwhelming.

During her first court case three years ago at age 18, was scheduled after she finally had the nerve and courage to speak up to her best friend [REDACTED] about the sexual abuse and [REDACTED] told her mother. Eventually everything came out. At that time she was coping emotionally by using drugs. When she went to court Michael's lawyers used her substance abuse as a cover up of the truth of [REDACTED]'s claims of sexual abuse from a very young age. The abuse started at a very young age which was way before she started any drug use.

[REDACTED] is now 21 and is starting to get more clarity within her memories of Michael's ongoing sexual, emotional, and physical abuse. [REDACTED] remembers as a young girl spending hours scratching his back. Eventually, Michael started fondling and tickling her at age 7 or 8 which eventually moved into sexual abusive acts. Michael's wife Jennifer moved from the bedroom with Michael to the couch to sleep at night and around [REDACTED] age span between 10, 11, or 12 she was asked to sleep with Michael in his bed. [REDACTED] remembers around age 11 or 12 in Moyock, North Carolina that she had a boyfriend and [REDACTED] remembers not wanting to have

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sex with him because she knew she was having sex with Michael. She also realized none of her friends were having sex with their boyfriends and that she didn't want to also. She also remembers being in middle school and being in her Sex Education class and feeling very sad and crying because she realized everything that the teacher was talking about happened to her and she was already exposed to all the things the teacher was talking about. [REDACTED] realized when the teacher brought up protection for condoms and that she was already being exposed without any say.

[REDACTED] expresses that she felt sad and sat in the back of the room and cried. That she felt life was unfair and she was abnormal. She recalls having to perform oral sex and regular intercourse at the extremely young ages all the way up to age 17. She recalls to wanting to cover her face as she felt extreme hurt, shame, and guilt.

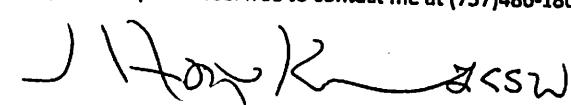
She always wanted to say no to the sex, and to all the ongoing physical labor she was expected to do in the house for Michael. She states that Michael always emotionally manipulating her by telling her that her parents abandoned and didn't love her and that he was building a bond with her as a father and that she couldn't ever tell anyone about their experiences and building a special bond that she could not tell anyone about.

[REDACTED] hopes that Michael will own his abusive behavior and truth of the sexual abuse. She also is in hope that he will be legally punished for child abuse and be sentenced to go to jail because of his constant sexual and emotional abuse.

In my professional opinion [REDACTED] has lost the innocence of her childhood and the innocence of knowing who she really is. She suffers from depression and has panic attacks and constant PTSD symptoms which impact her self-worth and personal relationships. There is no doubt in my professional opinion from our therapy sessions that this man is guilty and needs to be punished by law for the enormous emotional, physical, and sexual abuse.

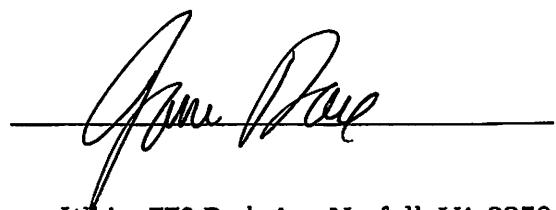
I am also wondering if there is some way she could be financially compensated for all the medical, mental, and emotional support that she has had to seek and pay for healing and recovering as well as any financial support and compensation for all her years of abuse and all the years she had to anticipate getting closure within the court system? During this drawn out time of emotional unease of the court case, she's been unable to focus on any career aspirations or personal career goals.

If you have any questions please feel free to contact me at (757)486-1807.

Sincerely, 
Pamela Hopkins L.C.S.W.

Pamela Hopkins L.C.S.W.

Jane Doe,

A handwritten signature in black ink, appearing to read "Jane Doe", is written over a horizontal line.

CC: Tonya White 770 Park Ave Norfolk VA 23504

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
DIVISION

Jane Doe
Plaintiff(s),

v.

Civil Action Number: 2-23cv470

NORFOLK STATE UNIVERSITY
Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of MOTION FOR APPENDUM
(Title of Document) STATEMENT OF CLAIM

Jane Doe
Name of Pro Se Party (Print or Type)

Jane Doe
Signature of Pro Se Party

Executed on: 3/5/2024 (Date)

(1) MOTION TO SUBMIT EVIDENCE
testimony Expert witness

OR

The following attorney(s) prepared or assisted me in preparation of _____.
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of Pro Se Party (Print or Type))

Signature of Pro Se Party

Executed on: _____ (Date)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing

(1) Jane Doe, was mailed
this (2) 5 Day of (3) March, to (4) 2024
Tonya White at (5) Norfolk State
University.

Jane Doe
(Your Signature)

Instructions

YOU must send a copy of every motion, pleading or document to the defendant(s) or counsel for defendant(s). If you do not send a copy to the defendant(s) or counsel for the defendant(s), the court will not be able to consider your document.

You must prepare and submit one certificate of service for EACH motion, pleading, or document you wish to have considered by the court.

Complete each blank as directed:

(1) Describe the document you are submitting to the court and sending to the defendant(s). (Remember: you should attach a Certificate of Service to each motion, pleading, or document you wish to have considered by the court.)

(2) Day of the month that you give the document to officials for mailing to the defendant(s) or counsel for the defendants(s).

(3) Month and year.

(4) Name of person(s) to whom you are sending a copy of the document. If you send it directly to the defendant(s), list each defendant to whom you send a copy. If you send it to counsel for the defendant(s), list only the name(s) of counsel.

(5) Address(es) that copy is being mailed to.

NOTE: YOU MUST SIGN THIS FORM. The court will not accept this form without an original signature.